



JUN 24 1988

William L. Warren, Esq.
 Cohen, Shapiro, Polisher, Sheikman & Cohen
 997 Lenox Drive - Building 3
 Lawrenceville, New Jersey 08648

Re: Scientific Chemical Processing (SCP) Site - Carlstadt

Dear Mr. Warren:

I am writing concerning a number of activities which relate to the SCP Carlstadt Site.

EPA has received and reviewed the May 27, 1988 Proposed Completion Schedule for the on-site feasibility study. This letter serves to approve this schedule with the following changes:

1. The Draft FS Report will be received at EPA three (3) weeks sooner than proposed. Specifically, the report will be submitted by September 5, 1988.
2. Delete all assumptions from the schedule. Should circumstances arise which may delay the delivery of the draft report, EPA will allow reasonable extensions, given sufficient notice. EPA expects to provide comments on the draft RI report and the first phase of the FS by July 13, 1988. EPA also plans to provide you with site specific ARARs by July 13, 1988.

Please make these changes and re-submit the schedule within one week.

As you are aware, the Baseline Risk Assessment was originally scheduled to be included in the RI Report. According to the March 19, 1988 schedule (approved by EPA only through Task 10, Initial Screening) the Baseline Risk Assessment was to be submitted by May 9, 1988, that is, three weeks after the RI Report. Then, in a meeting on May 17, 1988, you informed EPA that this document would not be submitted until May 31, 1988. Now, according to the latest schedule (May 27, 1988), you anticipate a delivery date of June 29, 1988. This report is now eight weeks late.

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As Janet Feldstein informed you on June 9, 1988, this delay is unacceptable to EPA. As you are aware, the Baseline Risk Assessment is critical to EPA's review of the RI and the first phase of the PS. Since the Risk Assessment has been significantly delayed, EPA may not be able to provide you with comments on that document by July 13, 1988. In addition, although EPA intends to comment on the RI and the first phase of the PS by July 13, 1988, EPA may provide further comments on these documents subsequent to July 13, 1988 based on the review of the Risk Assessment.

Concerning the off-site RI, EPA is currently reviewing the Proposed Project Operations Plan - Revision #8. EPA hopes to provide formal comments in the near future. However, please note the following initial concerns.

1. The title "Proposed Schedule Off-Site Remedial Investigation" is inappropriate. This schedule presents the time-frame for installing nine off-site wells, collecting samples, and analyzing sample data. It does not represent the off-site RI in its entirety. As you know, the off-site RI may include, but not be limited to, soil, sediment, biota, groundwater, and surface-water sampling and analysis.
2. EPA cannot accept the thirty two week time schedule to complete a single task (namely the nine-well installation, sampling, and data analysis) of the off-site RI. Please recall, the schedule for the entire on-site RI required thirty weeks. Please submit a more realistic schedule.

If you have any questions concerning this letter please contact Janet Feldstein, of my staff, at (212) 264-0613.

Sincerely yours,

Raymond Basso, Chief
Northern New Jersey Compliance Section

cc: Tom Armstrong, General Electric
Jack McBurney, Allied-Signal Inc.
Medhat Reiser, Nepera Inc.
Pam Lange, NJDEP

bcc:

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